

### **Remarks**

Claims 1-20 are pending, and claims 1-20 stand rejected. The Applicants respectfully traverse the rejection set forth by the Examiner.

#### **35 USC § 103 Rejection**

The Examiner has rejected claims 1-5, 7-11, and 14-18 under 35 USC § 103(a) as being obvious in view of admitted prior art and U.S. Patent 7,020,098 (Ehram). The Applicants submit that claims 1-5, 7-11, and 14-18 are non-obvious over the admitted prior art and Ehram.

The Applicants first submit that the Examiner has mischaracterized the admitted prior art from the pending patent application. In particular, the Examiner has stated on page 2 of the Office action that FIG. 1A discloses that “a special connection on the bearer network is established and at least a portion of the capacity of the special connection is reserved for transporting call signaling”. The Applicants completely disagree with this assertion. FIG. 1A and the corresponding section in the patent application (see pages 4-9) clearly show and describe that there are two separate networks: a signaling network (133) and a bearer network (134). Call signaling is transmitted over the signaling network and voice and data traffic is transmitted over the bearer network. There is no “special connection” over the bearer network in FIG. 1A that is established and reserved for call signaling as recited in claim 1. The Examiner cites reference number 131 as a “special connection” in FIG. 1A. However, reference number 131 in FIG. 1A merely represents a plurality of connections used to form transport network 130 (see page 4, lines 23-24). There is no indication in FIG. 1A or in the specification that describes FIG. 1A that there is a special connection over the bearer network (134) that is established and reserved for call signaling. If the Examiner maintains this rejection, the Applicants respectfully ask the Examiner to clearly describe how reference number 131 describes a “special connection” over a bearer network that is reserved for call signaling.

The Applicants secondly submit that Ehram does not teach or describe “a special connection on the bearer network is established and at least a portion of the capacity of the special connection is reserved for transporting call signaling” as recited in claim 1. Ehram describes transmitting signaling messages (SIP messages) and data (RTP data stream) over a packet network. As a result, the signaling messages and the data messages are transmitted over

the same type of network (i.e., a packet network). Thus, there would be no point to establishing a special connection over a bearer network that is reserved for call signaling in Ehram, as the bearer network and the signaling network are the same network.

The Applicants thirdly submit that Ehram does not teach the logic in the base station system as recited in claim 1 that “determines if the call signaling is for a low latency service, forwards the call signaling over the special connection on the bearer network if the call signaling is for a low latency service, and forwards the call signaling over the signaling network if the call signaling is not for a low latency service”. Ehram describes detecting when a real-time (low latency) media session is likely to be established, and acquire a data connection for the media session (see column 9, lines 38-61). There is no description in Ehram of determining if call signaling is for a low latency service. Ehram detects some type of action, like accessing a group list for a PTT call. The assumption in Ehram is that each communication is going to be a low latency session, and that is why the system in Ehram acquires the data connection before the session is even initiated.

Further, there is no description in Ehram that call signaling is forwarded over a special connection on a bearer network if the call signaling is for a low latency service as there is no special connection on a bearer network described in Ehram. Even further, there is no description in Ehram that call signaling is forwarded over a signaling network if the call signaling is not for a low latency service. Ehram does not distinguish between a signaling network and a bearer network, so there is no description in Ehram of forwarding call signaling over a signaling network if the call signaling is not for a low latency call. Ehram does not discuss what happens for a non-low latency session, as only low latency sessions are discussed. As a result, Ehram could not possibly describe the logic in a base station system as is recited in claim 1.

In rejecting this limitation, the Examiner cites to columns 7-8, lines 61-2 in Ehram. All this section of Ehram states is that logic in a mobile station may transmit a SIP INVITE message to initiate a data session. This section in Ehram in no way describes that a base station system determines whether call signaling is for a low latency service or a non-low latency service, and forwards the call signaling over a special connection on the bearer network if the call signaling is for a low latency service and forwards the call signaling over the signaling network if the call signaling is not for a low latency service. Again, if the Examiner maintains

this rejection, the Applicants respectfully ask the Examiner to clearly describe how a base station system in Ehram distinguishes between a low latency service and a non-low latency service, and transmits call signaling over different networks accordingly.

For at least the reasons provided above, the Applicants submit that claim 1 is non-obvious over admitted prior art and Ehram. The Applicants further submit that independent claims 7 and 14 and the dependent claims are non-obvious for at least the same reasons.

35 USC § 103 Rejection

The Examiner has rejected claims 6, 12-13, and 19-20 under 35 USC § 103(a) as being obvious in view of admitted prior art, U.S. Patent 7,020,098 (Ehram), and U.S. Patent publication 2002/0118665 (Cleveland). The Applicants submit that claims 6, 12-13, and 19-20 are non-obvious for at least the reasons provided above.

Conclusion

The Applicants submit that the pending claims are non-obvious for at least the reasons provided above. The Applicants thus respectfully ask the Examiner to allow claims 1-20.

Respectfully submitted,

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**SIGNATURE OF PRACTITIONER**

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